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APPLICATION

9161-62440

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
P.O. Box 94275
Baton Rouge, LA 70804-4275

Re: Substitute Unit Well
19800 TUSC RA SUC
False River Field
Pointe Coupee and West Baton Rouge Parishes, Louisiana

Dear Commissioner Welsh:

Application is hereby made of behalf of **PENNINGTON OIL & GAS INTERESTS, L.L.C.** for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order concerning the following matters pertaining to the **19,800' Tuscaloosa Sand, Reservoir A**, in the **False River Field**, Pointe Coupee and West Baton Rouge Parishes, Louisiana, for which rules and regulations were established and drilling and producing units were created by Office of Conservation Order No. 968, as amended and supplemented by the 968-A Series of Office of Conservation Orders, to-wit:

1. To permit the applicant, Pennington Oil & Gas Interests, L.L.C., to drill, designate and utilize the Pennington Oil & Gas Interests, L.L.C. – Oliver J. Jack, Sr., et ux No. 1 Well as a substitute unit well for 19800 TUSC RA SUC at the location shown on the plat attached hereto and made a part hereof, or any other location no closer than 330 feet to any unit boundary, which is in exception to the spacing provisions of the Order 968-A Series of Office of Conservation Orders;
2. To further define the 19,800' Tuscaloosa Sand, Reservoir A, in the False River Field, as that certain gas and condensate bearing sand encountered between the depths of 19,220 feet and 21,411 feet, electrical log

measurements, in the Chevron U.S.A., Inc. - Alma Plantation No. 1 Well, located in Section 87, Township 6 South, Range 11 East, Pointe Coupee Parish, Louisiana;

3. To the extent not inconsistent herewith, to continue in effect all pertinent provisions of the Office of Conservation Order No. 968-A Series of orders; and
4. To consider such other matters as may be pertinent to this application as shown by the evidence presented at the public hearing.

The 19,800' Tuscaloosa Sand, Reservoir A, was previously defined in Office of Conservation Order No. 968, effective January 28, 1976, was redefined several times, most recently by Office of Conservation Order No. 968-A-17, effective February 22, 1983, and is hereby further defined as that gas and condensate bearing sand encountered between the depths of 19,220 feet and 21,411 feet, electrical log measurements, in the Chevron U.S.A., Inc.-Alma Plantation No. 1 Well, located in Section 87, Township 6 South, Range 11 East, Pointe Coupee Parish, Louisiana.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **Harold P. "Chip" LeBlanc, Jr., with LeBlanc Geological, Inc., 3500 North Causeway, Suite 405, Metairie, Louisiana 70002, (504)-828-8700.**

There is attached hereto and made a part hereof a plat reflecting the proposed surface and bottom hole locations of the proposed substitute unit well, and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,


RANDALL C. SONGY

RCS/elg/bad/Enclosures

cc: Mr. Richard Hudson, District Manager
Office of Conservation

Interested Owners, Represented Parties
and Interested Parties

BP America
T. G. Neff, et al

BHL
Surf. 1

T

6

S

Sec. 89

FRV 19800 TUSC RA SUD

R

11

E

Sec. 87

NGS Mon.
"CHENAL 2"

S06°00'09"E 13,626.92' From
NGS Mon. "CHENAL 2"

PROPOSED SURF. LOCATION

Gr. Elev. = 24'
NAD 83 (1992) South Zone
Lat. = 30° 34' 13"
Long. = 91° 23' 02"
NAD 1927 (South Zone)
X = 1,984,130'
Y = 692,206'

Chevron

Pennington Oil &
Gas Interests, LLC

Alma Plantation

FRV 19800 TUSC RA SUC
Order No. 968

POINTE COUPEE PARISH

WEST BATON ROUGE PARISH

Lillie W. Kent

Glynette M. Jones

Lillie W. Kent

Renata M. Gibson

Missouri Pacific R.R.

Alice M. Mandoza, et al

Steven R. Delapasse, et al

Brenda D. LeTeff

Black

Williams, Sr.

John E. Williams, Sr.

Delapasse

Celeste B. Miller, et al

Jack, et ux

Priscilla D. McQueen, et al

Gertrude Maze Anderson

George J. Ardeneaux, et al

Sec. 7

S01°31'39"E 1,799.06'

105'

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

330' OFFSET

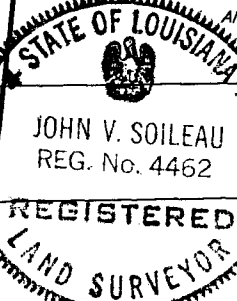
330' OFFSET

Lucille Watts Patin, et al

Sec. 8

PROPOSED BHL

NAD 1927 (South Zone)
X = 1,984,178'
Y = 690,407'



I, John V. Soileau, hereby certify that the surf. loc'n of Pennington Oil & Gas Interests, LLC's FRV 19800 T RA SU C; Jack, et ux No. 1 is as follows: S06°00'09"E 13,626.92' from NGS Mon. "CHENAL 2", falling in Section 87, T 6 S - R 11 E, Pointe Coupee & West Baton Rouge Parishes, Louisiana.

John V. Soileau

REGISTERED LAND SURVEYOR NO. 4462
STATE OF LOUISIANA
C. L. JACK STELLY & ASSOCIATES, INC.
FILE NO. 19636-L9.DWG

LOUISIANA OFFICE OF CONSERVATION
**PENNINGTON OIL & GAS
INTERESTS, LLC**
SUBSTITUTE UNIT WELL PLAT

POINTE COUPEE &
WEST BATON ROUGE PARISHES, LOUISIANA

SCALE: 1"= 1,000'

SEPTEMBER 15, 2004

NAD 83 (1992) South Zone